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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SANDRA MCMILLION, JESSICA
ADEKOYA, and IGNACIO PEREZ, on
Behalf of Themselves and all Others Similarly
Situating,

Plaintiffs,

v.

RASH CURTIS & ASSOCIATES,

Defendant.

Case No. 4:16-cv-03396-YGR

**AMENDED JOINT TRIAL EXHIBIT
LIST**

Date: March 29, 2019
Time: 1:00 p.m.
Courtroom 1, 4th Floor

Hon. Yvonne Gonzalez Rogers

I. PLAINTIFFS' TRIAL EXHIBIT LIST:

J.D.

EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	SHOWN TO ADMIT	OBJECTION	DATE ADMITTED
1	Perez Account RCA 001-004	Dan Correa	Yes	58	5-8-19
2	Global Connect Manual RCA 044-120	Dan Correa	Yes		
3	Intentionally left blank.		N/A		
4	Intentionally left blank.		N/A		
6	9/28/12 Status Code Matrix	Dan Correa	Yes	58-19	5-8-19
7	Intentionally left blank.		N/A		
8	2/13/16-2/18/16 emails w. N. Keith, N. Paff, B. Keith, T. Paff re cell phones/phone fields	Nick Keith	Yes	5-7-19	5-7-19
9	2/24/14-2/25/14 emails w/ N. Paff, N. Keith, Kizer, B. Keith, C. Paff, T. Paff re cell/phone field	Nick Keith	Yes	5-7-19	5-7-19
10	8/3/15-8/4/15 emails w/ N. Keith, B. Keith, C. Paff, T. Paff, N. Paff re cell phone scrubs/phone fields	Nick Keith	Yes	5-7-19	5-7-19
11	5/12/16 emails w/ N. Keith, B. Keith, C. Paff re 5+ phone fields	Nick Keith	Yes	5-13	5-13-19
12	5/12/16 emails w. N. Keith, Dan Correa, Greg Wilbert re phone field 5+ custom	Nick Keith	Yes		
13	Intentionally left blank.		N/A		
14	Intentionally left blank.		N/A		
15	Intentionally left blank.		N/A		
16	Intentionally left blank.		N/A		
17	Intentionally left blank.		N/A		
18	Intentionally left blank.		N/A		
19	DAKCS Software Systems Client Services Manual	Dan Correa	Yes		
20	DAKCS Software Systems Client Services Utilities Help Manual	Dan Correa	Yes		

I.D.

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
21	DAKCS Software Systems Vocality Help Manual	Dan Correa	Yes		
22	DAKCS Software Systems Vocality Beyond and Sting Setup	Dan Correa	Yes		
23	County of Solano Amendment to Request for Qualifications for Healthcare Related Debt Collection Services	Dan Correa	No	Relevance FRE 400-403	
24	Rash Curtis & Associates Collection Agency Debt Recovery Services Company Information	Dan Correa	Yes	5-7-19	5-7-19
26	5/25/15-5/27/15 emails w. D. Correa, D. Anderson, B. Conrad, Kizer, B. Keith, C. Paff re Sutter Foti Message	Dan Correa	No	Relevance FRE 400-403 5-7-19	5-7-19
27	9/15/15 emails w. D. Anderson, D. Correa, C. Paff, K. Boddie, B. Conrad, Kizer re skip lists	Dan Correa	Yes	5-7-19	5-7-19
28	Intentionally left blank.		N/A		
29	5/6/13 email w. B. Kimbell, D. Correa re status code campaigns	Dan Correa	Yes	5-7-19	5-7-19
30	Intentionally left blank.		N/A		
31	Intentionally left blank.		N/A		
32	12/11/14-12/12/14 emails w. B. North, C. Paff, D. Correa, B. Kimbell, B. Conrad re opt out list	Dan Correa	Yes	5-7-19	5-7-19
33	12/29/16 emails w/ D. Correa, M. Paff, T. Mitchell re cease and desist call lists	Dan Correa	Yes	5-7-19	5-7-19
34	6/29/17 emails w. T. Paff, B. Keith, C. Paff, N. Paff re 2015 FCC Ruling	Bob Keith	No	Relevance FRE 400-403	
35	Intentionally left blank.		N/A		

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STUP- TO ADMIT	OBJECTION	DATE ADMITTED
36	10/12/16 email w. B. Keith, T. Paff, C. Paff re calling cell phones	Bob Keith	No	Relevance FRE 400-403	
37	1/5/16 email from B. Keith to staff re 90 day call count	Bob Keith	Yes		
38	5/5/16-5/6/16 emails w. D. Correa, B. Keith, B. North, C. Paff re blocking fields 5+	Bob Keith	Yes		
42	8/5/13 emails w. B. Kimbell, C. Paff, D. Correa, B. Keith, Kizer re back to school month	Chris Paff	No	Relevance FRE 400-403	
43	2/28/14 email w/ A. Hyden, C. Paff re CPS questions	Chris Paff	Yes		
44	6/15/17 email w. C. paff re robocalls	Chris Paff	Yes		
45	Questions Excerpted from the FCC's Robocall Blocking NOI	Chris Paff	Yes		
46	6/30/17 Declaration of Darrin Bird, ECF Doc. No. 50-3	Darrin Bird	Yes		
47	7/3/17 Declaration of Robert Keith, ECF Doc. No. 50-2	Bob Keith	Yes		
48	DAKCS Software Systems VIC Client, Exhibit 11 to 12/11/17 Krivoshey Decl., ECF Doc. No. 139-2 DAKCS00001-266	Randall A. Snyder	No	Relevance FRE 400-403 Not specific as to which portions or pages FRE 702	
49	Intentionally left blank.		N/A		
50	Exhibit 22 to 1/8/18 Declaration of L. Timothy Fisher, ECF Doc. No. 151-1	Colin B. Weir	Yes		
51	Exhibit 23 to the 1/8/18 Declaration of L. Timothy Fisher, ECF Doc. No. 151-1	Colin B. Weir	No	Relevance FRE 400-403 FRE 702 5-8	5-8-19

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	SALE TO ADJUVANT	OBJECTION	DATE ADJUDICATED
52	Exhibit 2 to 4/13/18 Krivoshey Decl., ECF Doc. No. 190-1, RCA's Opposition to Plaintiff's Separate Statement of Undisputed Facts in Support of Summary Judgment or Partial Summary Judgment in <i>Hernandez v. Rash Curtis & Associates</i> , Case No. 2:16-cv-02455-GHW (E.D. Cal. Nov. 13, 2017), ECF Doc. No. 34.	N/A	No	Relevance FRE 400-403	
53	5/5/16 emails w. N. Paff, B. Keith, C. Paff, D. Correa, T. Paff re human error	Dan Correa	Yes		
54	11/12/18 Supplemental Declaration of Randall A. Snyder	Randall A. Snyder	No	Relevance FRE 400-403 FRE 702	
55	11/12/18 Class Member Data Tabulation Report of Anya Verkhovskaya	Anya Verkhovskaya	No	Relevance FRE 400-403 FRE 702	
56	11/12/18 Declaration of Colin B. Weir	Colin B. Weir	No 56A (MURKIN)	Relevance FRE 400-403 FRE 702	56A (5-7)
57	Global Connect Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No 57C (5-7) 57B 57A	Relevance FRE 400-403 FRE 702	57-C 5-7-19 57-A 5-7-19 57-B 5-7-19
58	VIC Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No 58A 5-7 58B	Relevance FRE 400-403 FRE 702	58A 5-7-19 58B 5-7-19
59	TCN Call Detail Records, as discussed by Colin Weir at his 12/11/18 Deposition	N/A	No 59A 59B	Relevance FRE 400-403 FRE 702	59A 5-7 59B 5-7

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STATUS TO ADMIT	OBJECTION	DATE ADMITTED
60	Defendant's Account Data as discussed by Colin Weir at his 12/11/18 Deposition (including all account numbers, demographic and personal information, and phone fields one through ten)	N/A	No	Relevance FRE 400-403 FRE 702 600-157	5-7-19
61	GC_calls2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	5-7 Relevance FRE 400-403 FRE 702	5-7-19
62	TCN_calls-2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	5-7 Relevance FRE 400-403 FRE 702	5-7-19
63	VIC_calls-2, as discussed at Anya Verkhovskaya's 12/6/18 Deposition	N/A	No	5-7 Relevance FRE 400-403 FRE 702	5-7-19
64	Intentionally left blank.		N/A		
65	Defendant's Responses to Plaintiffs' First Set of Interrogatories	N/A	Yes		
66	Defendant's Responses to Plaintiffs' First Set of Requests for Production	N/A	Yes		
67	Global Connect Dialer Sample	N/A	Yes		
68	Audit checklist RCA000121-123	N/A	Yes		
69	Rash Curtis Policy & Procedure: Quality Assurance Program – audit guidelines RCA000124-135	N/A	Yes		
70	Rash Curtis Quality Assurance Program – Employee Acknowledgement RCA000164	N/A	Yes		

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
71	Defendant Rash Curtis & Associates' Responses to Plaintiff's Interrogatories (Set One) in <i>McBride v. Rash Curtis & Associates</i> , Case No. 2:16-cv-02390-TLN-CKD (E.D. Cal. July 24, 2017).	N/A	Yes	Relevance FRE 400-403	
72	Defendant Rash Curtis & Associates' Responses to Plaintiff's Interrogatories (Set One) in <i>Oliver v. Rash Curtis & Associates</i> , Case No. 2:16-cv-02413-TLN-CKD (E.D. Cal. July 24, 2017).	N/A	No	Relevance FRE 400-403	
73	Defendant Rash Curtis & Associates' Reply Brief in Support of Motion for Summary Judgment or Partial Summary Judgment, ECF Doc. No. 157, at 13:6-13.	N/A	No	Relevance FRE 400-403	
74	Intentionally left blank.		N/A		
75	T-Mobile Production from Kevin Koslosky	Colin B. Weir	No	Relevance FRE 400-403 FRE 702	
76	Account Record Abbreviations RCA000192-193	N/A	Yes		
77	Skip Tracing Instructions RCA000195-199	N/A	Yes	5-8	5-8-19
78	Unredacted Perez Account Notes RCA000268-271	Dan Correa	Yes	5-8	5-8-19
79	5/5/2015 email w. B. Keith to T. Paff RCA-278403	Bob Keith	Yes		
80	11/19/15 emails w. B. Keith, T. Paff, C. Paff re cell phones RCA-282301-282303	Bob Keith	No	5/13 Relevance FRE 400-403 Attorney-Client Privileged	5-13-19

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STUP TO ADMIT	OBJECTION	DATE ADMITTED
81	8/3/15 emails w/ B. Keith, N. Keith, C. Paff, T. Paff, N. Paff re cell phones RCA-281392	Chris Paff	No	Relevance FRE 400-403 Attorney-Client Privileged 5-13	5-13-19
82	11/19/15 emails w. T. Paff, C. Paff, B. Keith re cell phones RCA-282306-282308	Chris Paff	No	Relevance FRE 400-403 Attorney-Client Privileged 5-13	5-13-19
83	5/5/16 email w. B. Keith, C. Paff, D. Correa, T. Paff, N. Paff RCA-268070	Bob Keith	No	Relevance FRE 400-403 5-9-19	5-9-19
84	Transcript/Video Excerpts from 4/13/17 Deposition of Steven Kizer	Steven Kizer	Yes		
85	Transcript/Video Excerpts from 10/16/17 Deposition of Nick Keith	Nick Keith	Yes		
86	Transcript/Video Excerpts from 10/20/17 Deposition of Dan Correa	Dan Correa	Yes		
87	Intentionally left blank.		N/A		
88	Intentionally left blank		N/A		

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II. DEFENDANT'S TRIAL EXHIBIT LIST:

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
501	Intentionally left blank.		N/A		
502	Intentionally left blank.		N/A		
503	Rash Curtis' Collection Notes/Business Records for Daniel Reynoso (RCA 268-271).	Bob Keith	Yes		
504	Daniel Reynoso's Medical Records from Sutter General Hospital (RCA 272-278).	Bob Keith	No	MIL 2, FRE 802, 403, FRCP 37	
505	May 5, 2017 Email from Bob Keith to Mike Paff attaching Sutter General Hospital's Client Notes for Daniel Reynoso (RCA 012718-012724).	Bob Keith	No	MIL 2, FRE 802, 403, 801, 803	
506	Rash Curtis' Business Records, showing the ECA Advanced Trace Report received as to Daniel Reynoso, which shows the cell phone number ending in 5193 was not skip-traced (RCA 279).	Nick Keith	No	MIL 1, FRCP 37	
507	Rash Curtis' Business Records, showing the Edit Tracking Report for Daniel Reynoso's account, which shows the cell phone number ending in 5193 was provided to Rash Curtis by Sutter General Hospital on May 7, 2015 and removed by Rash Curtis on June 7, 2016 (RCA 280).	Nick Keith	No	MIL 1, FRCP 37	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
508	Intentionally left blank.		N/A		
509	Intentionally left blank.		N/A		
510	Intentionally left blank.		N/A		
511	Rash Curtis' Abbreviation Key for Collection Notes (RCA 192-193).	Bob Keith	Yes		
512	Plaintiffs' Notice of Subpoenas to Produce Documents and Subpoenas to T-Mobile USA, Inc., LexisNexis Risk Data Management, Inc., and LexisNexis Risk Solutions FL, Inc., served on April 26, 2017.	Ignacio Perez	No	FRE 401, 403	
513	Phone Records Produced by T-Mobile (MetroPCS) in Response to Plaintiffs' Subpoena, produced on August 16, 2017.	Ignacio Perez	Yes		
514	Intentionally left blank.		N/A		
515	Intentionally left blank.		N/A		
516*	True and correct copies of excerpts from the Deposition of Nick Keith, taken October 16, 2017.	Nick Keith	No	MIL 7	
517*	True and correct copies of excerpts from the Deposition of Daniel Correa, taken October 20, 2017.	Daniel Correa	No	MIL 7	
518*	True and correct copies of excerpts from the Deposition of Chris Paff, taken October 24, 2017.	Chris Paff	No	MIL 7	
519*	True and correct copies of excerpts from the	Robert Keith	No	MIL 7	

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	Deposition of Robert Keith, taken October 24, 2017.				
520	True and correct copies of excerpts from the Deposition of Plaintiff Ignacio Perez, taken July 13, 2017.	Ignacio Perez	No	MIL 7	
521	True and correct copies of excerpts from the Deposition of Steven Kizer, taken April 13, 2017.	Steven Kizer	No	MIL 7	
522	December 20, 2018 Invoice from Class Experts Group, LLC to Bursor & Fisher, P.A. (McMillion000099).	Anya Verkhovskaya	Yes		
523	True and correct excerpts from "5 Fuzzy Match Output Step 2 Final" (not bates-stamped).	Anya Verkhovskaya	Yes	58-19	58-19
524	True and correct excerpts from "2018-10-16 historical 1-4 version 1 101518" Spreadsheet (not bates-stamped).	Nick Keith	Yes		
525	Plaintiffs' Notice of Subpoena and Subpoena to Testify at a Deposition in a Civil Action to DAKCS Software Systems, Inc., served on October 11, 2017.	Ignacio Perez	No	FRE 401, 403	
526	Business Records Produced by DAKCS Software Systems, Inc. in Response to Plaintiffs' Subpoena, produced on November 2, 2017 (DAKCS 00001-00266).	Ignacio Perez	Yes		

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
527	October 16, 2015 Email from Steven Kizer to Bob Keith and Chris Paff regarding Rash Curtis' policies on skip-tracing and removing phone numbers upon Do-Not-Call requests (RCA 125254-125255).	Bob Keith	No	FRE 801, 802, 803	
528	February 28, 2014 Email from Ashlee Hyden of DAKCS Software Systems, Inc. to Chris Paff regarding cell phone scrub technology (RCA 040794).	Chris Paff	No	FRE 801, 802, 803	
529	May 16, 2016 Email from Nick Keith to Daniel Correa regarding GlobalConnect's outbound limitations (RCA 133979-133982).	Nick Keith	No	FRE 801, 802, 803	
530	August 4, 2015 Email from Nick Keith to Bob Keith regarding phone numbers supplied to Rash Curtis from its creditor-clients (RCA 258388-258391).	Nick Keith/Bob Keith	No	FRE 801, 802, 803	
531	August 4, 2015 Email from Nick Keith to Bob Keith regarding Rash Curtis' policy to separate verified phone numbers from unverified phone numbers (RCA 258397-258400).	Nick Keith/Bob Keith	No	FRE 801, 802, 803	
532	December 11, 2017 Email from Randall Snyder to Yeremey Krivoshey (McMillion000013-000026).	Randall Snyder	Yes		

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
533	January 30, 2018 Email from Anya Verkhovskaya to Yeremy Krivoshey (McMillion000034).	Anya Verkhovskaya	Yes	5-8-19	5-8-19
534	January 30, 2018 Email from Yeremey Krivoshey to Anya Verkhovskaya (McMillion000035).	Yeremey Krivoshey	Yes	5-8	5-8-19
535	January 30, 2018 Email from Anya Verkhovskaya to Yeremey Krivoshey (McMillion000036).	Anya Verkhovskaya	Yes	5-8	5-8-19
536	November 27, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000053).	Randall Snyder	Yes		
537	November 28, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000054-000055).	Randall Snyder	Yes		
538	December 11, 2018 Email from Rebecca Richter to Randall Snyder (McMillion000072).	Randall Snyder	Yes		
539	May 2, 2017 Email from Colin Weir to Scott Bursor (McMillion000086).	Colin Weir	Yes	5-8-19	5-8-19
540	September 5, 2017 Email from Colin Weir to Scott Bursor (McMillion000087).	Colin Weir	Yes	5-8	5-8-19
541	September 4, 2018 Email from Colin Weir to Scott	Colin Weir	Yes	5-8	5-8-19

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	Bursor (McMillion000088).				
542	January 2, 2018 Email from Colin Weir to Scott Bursor (McMillion000089).	Colin Weir	Yes	5-8	5-8-19
543	March 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000090).	Colin Weir	Yes	5-8	5-8-19
544	February 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000091).	Colin Weir	Yes		
545	August 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000092).	Colin Weir	Yes	5-8	5-8-19
546	April 2, 2018 Email from Colin Weir to Scott Bursor (McMillion000093).	Colin Weir	Yes	5-8	5-8-19
547	June 1, 2017 Email from Colin Weir to Scott Bursor (McMillion000094).	Colin Weir	Yes	5-8	5-8-19
548	December 4, 2017 Email from Colin Weir to Scott Bursor (McMillion000095).	Colin Weir	Yes	5-8	5-8-19
549	December 5, 2018 Email from Colin Weir to Scott Bursor (McMillion000096).	Colin Weir	Yes	5-8	5-8-19
550	November 1, 2018 Email from Colin Weir to Scott Bursor (McMillion000097).	Colin Weir	Yes	5-8	5-8-19
551	October 2, 2018 Email from Colin Weir to Scott	Colin Weir	Yes	5-8	5-8-19

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	Bursor (McMillion000098).				
552	December 17, 2018 Invoice from Wireless Research Services to Bursor & Fisher, P.A. (McMillion000076).	Colin Weir	Yes		
553	November 28, 2018 Email from Randall Snyder to Yeremey Krivoshey (McMillion000059- 000060).	Randall Snyder	Yes		
554	True and correct copies of excerpts from the Deposition of Anya Verkhovskaya, taken December 6, 2018.	Anya Verkhovskaya	No	MIL 7	
555	Excerpts from the Spreadsheet Associated with Anya Verkhovskaya's Rule 26 Report (Exhibit 2 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes	5-8	5-8-19
556	Notice of Deposition of Anya Verkhovskaya (Exhibit 3 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	No	FRE 401, 403	
557	Declaration of Anya Verkhovskaya (Exhibit 4 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
558	Retainer Agreement between Anya Verkhovskaya and Bursor & Fisher, P.A. (Exhibit 5 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		

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TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
559	Invoice 1022 from CEG to Bursor & Fisher, P.A. (Exhibit 6 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
560	Invoice 1121 from CEG to Bursor & Fisher, P.A. (Exhibit 7 to the Deposition of Anya Verkhovskaya).	Anya Verkhovskaya	Yes		
561	True and correct copies of excerpts from the Deposition of Colin Weir, taken December 11, 2018.	Colin Weir	No	MIL 7	
562	Notice of Deposition of Colin Weir (Exhibit 1 to the Deposition of Colin Weir).	Colin Weir	No	FRE 401, 403	
563	Declaration of Colin Weir (Exhibit 2 to the Deposition of Colin Weir).	Colin Weir	Yes		
564	Engagement Agreement between Colin Weir and Bursor & Fisher, P.A. (Exhibit 3 to the Deposition of Colin Weir).	Colin Weir	Yes	5-8	5-8-19
565	November 30, 2018 Invoice from Economics and Technology, Inc. to Bursor & Fisher, P.A. (Exhibit 4 to the Deposition of Colin Weir).	Colin Weir	Yes		
566	Further Invoices from Economics and Technology, Inc. to Bursor & Fisher, P.A. (Exhibit 5 to the	Colin Weir	Yes		

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
	Deposition of Colin Weir).				
567	Statement of Qualifications of Colin Weir (Exhibit 6 to the Deposition of Colin Weir).	Colin Weir	Yes		
568	True and correct copies of excerpts from the Deposition of Randall Snyder, taken December 17, 2018.	Randall Snyder	No	MIL 7	
569	Notice of Deposition of Randall Snyder (Exhibit 1 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 401, 403	
570	Curriculum Vitae (Professional Summary) of Randall Snyder (Exhibit 2 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
571	Curriculum Vitae (Litigation Support Experience) of Randall Snyder (Exhibit 3 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
572	Wireless Research Services, LLC 2017 Rate Sheet and Retained Agreement with Bursor & Fisher, P.A. (Exhibit 4 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
573	November 12, 2018 Supplemental Declaration of Randall Snyder (Exhibit 5 to the Deposition of Randall Snyder).	Randall Snyder	Yes		

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
574	May 29, 2017 Invoice from Wireless Research Services, LLC to Bursor & Fisher, P.A (Exhibit 6 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
575	"Exactly What Is An Autodialer?" Power-point Presentation (Exhibit 7 to the Deposition of Randall Snyder).	Randall Snyder	Yes		
576	May 30, 2017 Declaration of Randall Snyder (Exhibit 9 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
577	October 16, 2017 Declaration of Randall Snyder (Exhibit 10 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
578	December 11, 2017 Declaration of Randall Snyder (Exhibit 11 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
579	March 5, 2018 Declaration of Randall Snyder (Exhibit 12 to the Deposition of Randall Snyder).	Randall Snyder	No	FRE 403	
580	True and Correct Excerpts from the June 20, 2017 Deposition of Steve Kizer (Exhibit 14 to the Deposition of Randall Snyder).	Randall Snyder, Steven Kizer	No	MIL 7, MIL 5, FRE 401, 403	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
581	December 11, 2017 Declaration of Bob Keith (Exhibit 15 to the Deposition of Randall Snyder).	Randall Snyder	No	MIL 5, FRE 401, 403	
582	Daniel Reynoso's Account Records (Exhibit 16 to the Deposition of Randall Snyder).	Randall Snyder	No	MIL 1, FRCP 37	
583	Complaint for TCPA damages, styled <i>Diane Steele v. Rash Curtis & Associates</i> , United States District Court, Eastern District of California, Case No. 2:17-cv-02626-JAM-AC, filed 12/15/17.	Bob Keith	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
584	Medical account overview from Contra Costa Regional Medical Center for Steven Milligan, showing the 925-435-6429 phone number and that the account was assigned to Rash Curtis for collection.	Bob Keith	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
585	Medical account overview for Diane Steele, showing the 925-435-6429 phone number and that the account was assigned to Rash Curtis for collection.	Bob Keith	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
586	True and Correct Excerpts from the June 20, 2017 Deposition of Steven Kizer from <i>Rash Curtis & Associates, Inc. v. Steven Kizer</i> , Superior Court of the State of California County of Solano Case No. FCS048565.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
587	True and Correct Excerpts from the July 6, 2017 Deposition of Steven Kizer from <i>Rash Curtis & Associates, Inc. v. Steven Kizer</i> , Superior Court of the State of California County of Solano Case No. FCS048565.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
588	Complaint for the Labor Commissioner's Office filed by Steven Kizer against Rash Curtis, State Case No. 08-78737, filed September 16, 2016	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
589	Final Order and Decision in Kizer's Labor Board case against Rash Curtis, State Case No. 08-78737, dated August 22, 2018.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
590	Kizer's "Notice of Claim" and time/wages claimed in State Case No. 08-78737, dated January 20, 2017.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
591*	Personnel Action Form for Steven Kizer, signed by Steven Kizer on December 1, 2012.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
592*	Inbound Phone Line; Expectations and Rules, signed by Steven Kizer on July 2, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
593*	Certificate of Completion – Workplace Harassment: Prevention and the law-Supervisor Field 120, certifying Steven Kizer's completion on May 28, 2013.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
594*	Policy & Procedure: Harassment Free Workplace ("Management"), signed by Steven Kizer on March 17, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
595*	Interoffice Memo to exempt employees, signed by Steven Kizer on December 17, 2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
596*	Kizer email dated May 26, 2016.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
597*	Payroll Summary re Steven Kizer 12/2012 – 12/2015.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
598*	Kizer email with self-authored Biography, dated May 6, 2013	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
599*	Work Order Guidelines issued by Steven Kizer dated March 12, 2013.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

TRIAL EXHIBIT NO.	DESCRIPTION	SPONSORING WITNESS	STIP. TO ADMIT	OBJECTION	DATE ADMITTED
600*	Steven Kizer's resume	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
601*	Steven Kizer's IT Job Description.	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
602*	Steven Kizer's LinkedIN Resume	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
603*	Steven Kizer's internal email communications at Rash Curtis	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
604*	Excerpts from Steven Kizer's Absence/Schedule Adjustment Request Forms	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
605*	Steven Kizer's Paid Time Off Statements	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
606*	Email re Steven Kizer's FMLA/CFRA Leave, dated March 21, 2016	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	
607	Comparison Exhibits re wage claims and PTO	Steven Kizer	No	FRCP 37, FRE 401, 403, 802, Scheduling Order (ECF 246)	

UNITED STATES DISTRICT COURT
for the Northern District of California

Case No. 16-CV-3396-YGR Date 2019

PEREZ vs. RASH CURTIS & ASSOCIATES

EXHIBIT LIST

☐

Plaintiff

☒

Defendant

EXHIBIT NUMBER	DESCRIPTION	SPONSORING WITNESS	DATE	
			Marked for Identification	Admitted in Evidence
608A	DOC	VERKHOVSKAYA	5-8	5-8-19
608D	DOC			
609A	DOC		5-8	5-8-19
610A	DOC		5-8	5-8
610D	DOC			
611A	DOC		5-8	5-8
611D	DOC			
612	DOC		5-9	5-9-19